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CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

United States Courts
Southern District of Texas
FILED

April 08, 2019

UNITED STATES DISTRICT COURT David J. Bradley, Clerk of Court
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2019 Grand Jury **4:19MJ601**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HUBBARD BELL JR., IV,
aka "Hubbard Bell,"
aka "Hubb,"
FEMI FELIX-UKWU,
ARNOLD NICHOLS II,
aka "A,"
KAMILLE JEMISON,
aka "Camille Jemison,"
MONIQUE FERGUSON, and
ALPHONSO LLOYD,

Defendants.

CR No. 18-529 (A) -MWF

F I R S T
S U P E R S E D I N G
I N D I C T M E N T

[18 U.S.C. § 1349: Conspiracy to
Commit Wire Fraud; 18 U.S.C.
§ 1028(f): Conspiracy to Possess,
Use, and Transfer a Means of
Identification; 18 U.S.C.
§ 1028(a)(7): Unlawful Possession,
Use, and Transfer of Means of
Identification; 18 U.S.C.
§ 1028A(a)(1): Aggravated Identity
Theft]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1349]

A. INTRODUCTORY ALLEGATIONS

Unless otherwise stated, at all times relevant to this First
Superseding Indictment:

Defendants

1. Defendant HUBBARD BELL JR., IV, also known as ("aka")

1 "Hubbard Bell," aka "Hubb" ("defendant BELL"), was a resident of
2 Houston, Texas. From on or about June 25, 2015 to on or about
3 October 12, 2015, defendant BELL was an employee of Mesa Airlines
4 ("Mesa"). In connection with his employment, defendant BELL was
5 provided a unique employee identification number.

6 2. Defendant FEMI FELIX-UKWU ("defendant FELIX-UKWU") was a
7 resident of Houston, Texas.

8 3. Defendant ARNOLD NICHOLS II, aka "A" ("defendant NICHOLS"),
9 was a resident of Houston, Texas.

10 4. Defendant KAMILLE JEMISON, aka "Camille Jemison"
11 ("defendant JEMISON"), was a resident of Houston, Texas.

12 5. Defendant MONIQUE FERGUSON ("defendant FERGUSON") was a
13 resident of Houston, Texas.

14 6. Defendant ALPHONSO LLOYD ("defendant LLOYD") was a resident
15 of Houston, Texas.

16 7. Co-conspirator D.H. was a resident of Los Angeles,
17 California.

18 Referenced Airports

19 8. Los Angeles International Airport ("LAX") was an airport
20 located in Los Angeles, California, in Los Angeles County, within the
21 Central District of California.

22 9. Houston International Airport ("IAH") was an airport
23 located in Houston, Texas.

24 10. Atlanta International Airport ("ATL") was an airport
25 located in Atlanta, Georgia.

26 11. Newark International Airport ("EWH") was an airport located
27 in Newark, New Jersey.

1 12. LaGuardia International Airport ("LGA") was an airport
2 located in Queens, New York.

3 13. Minneapolis-St. Paul International Airport ("MSP") was an
4 airport located in Minneapolis, Minnesota.

5 14. Las Vegas International Airport ("LAS") was an airport
6 located in Las Vegas, Nevada.

7 15. Baltimore International Airport ("BWI") was an airport
8 located in Baltimore, Maryland.

9 16. Augusto Sandino International Airport ("MGA") was an
10 airport located in Managua, Nicaragua.

11 17. Ft. Lauderdale International Airport ("FLL") was an airport
12 located in Ft. Lauderdale, Florida.

13 18. Las Americas International Airport ("SDQ") was an airport
14 located in the Dominican Republic.

15 19. San Jose International Airport ("SJO") was an airport
16 located in San Jose, California.

17 Non-Revenue Travel

18 20. A non-revenue ticket was a ticket for a seat on a flight
19 that an airline provided to a passenger at no cost to the passenger
20 and for no revenue to the airline. Mesa provided access to non-
21 revenue tickets as a benefit to its employees. Mesa employees and
22 their designated beneficiaries were permitted to use this benefit
23 only while employed by Mesa. The benefit was not transferrable.

24 21. Mesa maintained reciprocal agreements with other airlines,
25 including Spirit Airlines ("Spirit"), which permitted Mesa employees
26 to travel on the other airlines' flights on a non-revenue basis.

27 22. To book a non-revenue ticket for a Spirit flight, a Mesa
28 employee used a web portal maintained by Spirit (the "Spirit Web

1 Portal"). The Spirit Web Portal required that personal identifying
2 information of the Mesa employee, including the employee's unique
3 Mesa identification number and the employee's date of hire, as well
4 as a unique verification code, be entered to book a non-revenue
5 ticket.

6 23. When a Mesa employee flew on a non-revenue ticket, the
7 employee would fly on stand-by status. Mesa employees were
8 frequently required to show their Mesa employee identification card
9 at the airport to secure their non-revenue seat. The Mesa employee
10 identification card showed, among other things, a photograph of the
11 employee, the employee's unique Mesa identification number, and the
12 employee's date of hire.

13 B. OBJECT OF THE CONSPIRACY

14 24. Beginning on a date unknown but at least as early as
15 February 2016, and continuing until a date unknown but at least as
16 late as in or about November 2017, in Los Angeles County, within the
17 Central District of California, and elsewhere, defendants BELL,
18 FELIX-UKWU, NICHOLS, JEMISON, FERGUSON, and LLOYD, together with co-
19 conspirator D.H. and others known and unknown to the Grand Jury,
20 knowingly combined, conspired, and agreed to commit wire fraud, in
21 violation of Title 18, United States Code, Section 1343.

22 C. THE MANNER AND MEANS OF THE CONSPIRACY

23 25. The object of the conspiracy was carried out, and to be
24 carried out, in substance, as follows:

25 (a) Defendant BELL, and others known and unknown to the
26 Grand Jury, would obtain without authorization lists of current Mesa
27 employees, which included, among other things, the names, dates of
28 hire, and Mesa employee identification numbers for the employees

1 ("Mesa employee lists").

2 (b) Others known and unknown to the Grand Jury would
3 obtain without authorization the unique verification code needed to
4 book non-revenue tickets on the Spirit Web Portal.

5 (c) Defendants BELL, NICHOLS, and JEMISON, co-conspirator
6 D.H., and others known and unknown to the Grand Jury, would sell or
7 otherwise provide to others who were not entitled to travel on non-
8 revenue tickets (the "fraudulent travelers"), the dates of hire and
9 Mesa employee identification numbers of the Mesa employees included
10 on the Mesa employee lists, as well as the verification code. Using
11 this information, the fraudulent travelers would book non-revenue
12 tickets for Spirit flights through the Spirit Web Portal.

13 (d) Defendants BELL, FELIX-UKWU, NICHOLS, JEMISON, and
14 FERGUSON, co-conspirator D.H., and others known and unknown to the
15 Grand Jury, would make reservations on the Spirit Web Portal on
16 behalf of themselves and other fraudulent travelers for non-revenue
17 tickets for Spirit flights using Mesa identification numbers, dates
18 of hire, and a verification code. After his termination from Mesa,
19 defendant BELL would continue to fraudulently use his employee
20 identification number and date of hire to book non-revenue tickets
21 for himself on Spirit flights.

22 (e) Defendants BELL, FELIX-UKWU, NICHOLS, JEMISON, and
23 FERGUSON, and others known and unknown to the Grand Jury, would
24 manufacture fraudulent Mesa employee identification cards for use by
25 the fraudulent travelers to board flights. These identification
26 cards would purport to identify the fraudulent traveler as a Mesa
27 employee and contain the employee identification number and date of
28 hire of a true Mesa employee.

1 (f) The fraudulent travelers, including but not limited to
2 defendants BELL, FELIX-UKWU, NICHOLS, JEMISON, FERGUSON, and LLOYD,
3 and co-conspirator D.H., would fly on Spirit flights using the non-
4 revenue tickets booked through the Spirit Web Portal.

5 (g) As was reasonably foreseeable to defendants BELL,
6 FELIX-UKWU, NICHOLS, JEMISON, FERGUSON, and LLOYD, co-conspirator
7 D.H., and their co-conspirators, interstate wires were routinely used
8 to communicate flight and other information from and to defendants
9 BELL, FELIX-UKWU, NICHOLS, JEMISON, FERGUSON, and LLOYD, co-
10 conspirator D.H., and their co-conspirators, and also from and to
11 defendants BELL, FELIX-UKWU, NICHOLS, JEMISON, FERGUSON, and LLOYD,
12 co-conspirator D.H., and their co-conspirators, and Mesa and Spirit.

13 D. OVERT ACTS

14 26. On or about the following dates, in furtherance of the
15 conspiracy, and to accomplish its object, defendants BELL, FELIX-
16 UKWU, NICHOLS, JEMISON, FERGUSON, and LLOYD, co-conspirator D.H., and
17 others known and unknown to the Grand Jury, committed and willfully
18 caused others to commit the following overt acts, among others, in
19 the Central District of California, and elsewhere:

20 Overt Act No. 1: On or about March 10, 2016, defendant BELL
21 used a fraudulently obtained non-revenue ticket to fly from FLL to
22 MGA.

23 Overt Act No. 2: On or about March 10, 2016, defendant BELL
24 fraudulently booked a non-revenue ticket for a flight from IAH to MGA
25 for O.A.

26 Overt Act No. 3: On or about April 28, 2016, defendant
27 FERGUSON used a fraudulently obtained non-revenue ticket to fly from
28 IAH to SJO.

1 Overt Act No. 4: On or about May 1, 2016, defendant FERGUSON
2 used a fraudulently obtained non-revenue ticket to fly from SJO to
3 IAH.

4 Overt Act No. 5: On or about May 4, 2016, defendant BELL used
5 a fraudulently obtained non-revenue ticket to fly from IAH to LAX.

6 Overt Act No. 6: On or about May 4, 2016, defendant BELL used
7 a fraudulently obtained non-revenue ticket to fly from LAX to MSP.

8 Overt Act No. 7: On or before May 19, 2016, defendant BELL
9 fraudulently booked a non-revenue ticket for a flight for A.F.

10 Overt Act No. 8: On or about May 28, 2016, defendant NICHOLS
11 used a fraudulently obtained non-revenue ticket to fly from LAX to
12 IAH.

13 Overt Act No. 9: On or about June 2, 2016, a co-conspirator
14 emailed defendant BELL employee lists containing employee information
15 for Mesa employees based in Dallas, Texas, and Houston, Texas.

16 Overt Act No. 10: On or about June 13, 2016, defendant FELIX-
17 UKWU used a fraudulently obtained non-revenue ticket to fly from IAH
18 to LAX.

19 Overt Act No. 11: On or about June 14, 2016, defendant FELIX-
20 UKWU used a fraudulently obtained non-revenue ticket to fly from LAX
21 to IAH.

22 Overt Act No. 12: On or about August 28, 2016, defendant BELL
23 used a fraudulently obtained non-revenue ticket to fly from LAX to
24 IAH.

25 Overt Act No. 13: On or about September 19, 2016, defendant
26 BELL used a fraudulently obtained non-revenue ticket to fly from IAH
27 to LAX.

1 Overt Act No. 14: On or about October 1, 2016, defendant BELL
2 used a fraudulently obtained non-revenue ticket to fly from LAX to
3 IAH.

4 Overt Act No. 15: On or about October 10, 2016, defendant BELL
5 used a fraudulently obtained non-revenue ticket to fly from LAX to
6 IAH.

7 Overt Act No. 16: On or about October 15, 2016, defendant BELL
8 used a fraudulently obtained non-revenue ticket to fly from LAX to
9 IAH.

10 Overt Act No. 17: On or about November 10, 2016, defendant
11 BELL used a fraudulently obtained non-revenue ticket to fly from LAX
12 to IAH.

13 Overt Act No. 18: On or before November 21, 2016, co-
14 conspirator D.H. fraudulently booked non-revenue tickets for flights
15 for A.R. from IAH to LAX and LAX to IAH.

16 Overt Act No. 19: On or about November 26, 2016, co-
17 conspirator D.H. used a fraudulently obtained non-revenue ticket to
18 fly from LAX to ATL.

19 Overt Act No. 20: On or about November 28, 2016, co-
20 conspirator D.H. used a fraudulently obtained non-revenue ticket to
21 fly from ATL to LAX.

22 Overt Act No. 21: On or about December 8, 2016, co-conspirator
23 D.H. used a fraudulently obtained non-revenue ticket to fly from LAX
24 to LGA.

25 Overt Act No. 22: On or before December 8, 2016, co-
26 conspirator D.H. fraudulently booked a non-revenue ticket for a
27 flight from BWI to LAX for E.M.

28 Overt Act No. 23: On or about December 18, 2016, co-

1 conspirator D.H. used a fraudulently obtained non-revenue ticket to
2 fly from LAX to ATL.

3 Overt Act No. 24: On or about December 20, 2016, defendant
4 BELL used a fraudulently obtained non-revenue ticket to fly from LAX
5 to IAH.

6 Overt Act No. 25: On or about December 26, 2016, defendant
7 NICHOLS used a fraudulently obtained non-revenue ticket to fly from
8 IAH to LAX.

9 Overt Act No. 26: On or about January 21, 2017, defendant
10 JEMISON used a fraudulently obtained non-revenue ticket to fly from
11 IAH to EWR.

12 Overt Act No. 27: On or about January 25, 2017, defendant
13 JEMISON used a fraudulently obtained non-revenue ticket to fly from
14 EWR to IAH.

15 Overt Act No. 28: On or about February 6, 2017, defendant BELL
16 emailed a co-conspirator a copy of defendant BELL's expired Mesa
17 employee identification card.

18 Overt Act No. 29: On or about February 10, 2017, defendant
19 JEMISON used a fraudulently obtained non-revenue ticket to fly from
20 IAH to LAX.

21 Overt Act No. 30: On or about February 11, 2017, defendant
22 FELIX-UKWU used a fraudulently obtained non-revenue ticket to fly
23 from FLL to SDQ.

24 Overt Act No. 31: On or about February 13, 2017, defendant
25 FELIX-UKWU used a fraudulently obtained non-revenue ticket to fly
26 from SDQ to FLL.

27 Overt Act No. 32: On or about February 21, 2017, defendant
28 BELL emailed FELIX-UKWU an image of defendant BELL's Mesa

1 identification card with defendant BELL's personal information
2 redacted.

3 Overt Act No. 33: On or about February 22, 2017, defendant
4 FELIX-UKWU placed an order with Kool Krew for Mesa crew luggage tags
5 containing the employee identification number and date of hire of a
6 Mesa employee.

7 Overt Act No. 34: On or about February 24, 2017, defendant
8 BELL used the internet to purchase a plastic identification card
9 printer.

10 Overt Act No. 35: On or about February 28, 2017, defendant
11 FERGUSON emailed defendant BELL a blank Mesa employee identification
12 card template.

13 Overt Act No. 36: On or about February 28, 2017, defendant
14 FERGUSON emailed defendant FELIX-UKWU images of five Mesa
15 identification cards for defendants FERGUSON and FELIX-UKWU, and
16 three co-conspirators.

17 Overt Act No. 37: On or about March 1, 2017, defendant FELIX-
18 UKWU used the internet to purchase plastic identification card stock.

19 Overt Act No. 38: On or about March 1, 2017, defendant
20 FERGUSON emailed defendant FELIX-UKWU an image of a Mesa
21 identification card for a co-conspirator.

22 Overt Act No. 39: On or about March 13, 2017, defendant FELIX-
23 UKWU used the internet to purchase a plastic identification card
24 printer.

25 Overt Act No. 40: On or about March 13, 2017, a co-conspirator
26 emailed defendant BELL a blank Mesa employee identification card
27 template.

28 Overt Act No. 41: On or about March 14, 2017, defendant BELL

1 emailed defendant NICHOLS a blank Mesa employee identification card
2 template.

3 Overt Act No. 42: On or about March 14, 2017, defendant
4 NICHOLS forwarded to defendant JEMISON the blank Mesa employee
5 identification card template sent to him by defendant BELL.

6 Overt Act No. 43: On or about March 14, 2017, defendant FELIX-
7 UKWU emailed defendant FERGUSON an image of defendant BELL's Mesa
8 identification card with defendant BELL's personal information
9 redacted.

10 Overt Act No. 44: On or about March 15, 2017, defendant
11 JEMISON emailed herself a photo of a Mesa employee identification
12 card.

13 Overt Act No. 45: On or about March 16, 2017, defendant
14 JEMISON emailed defendant NICHOLS a Mesa employee identification card
15 containing the photograph of a co-conspirator.

16 Overt Act No. 46: On or about March 16, 2017, defendant
17 JEMISON emailed defendant NICHOLS Mesa employee identification card
18 templates and photographs of other co-conspirators.

19 Overt Act No. 47: On or about March 16, 2017, at approximately
20 5:51 p.m., defendant JEMISON emailed defendant BELL a Mesa employee
21 identification card template.

22 Overt Act No. 48: On or about March 16, 2017, at approximately
23 6:48 p.m., defendant JEMISON emailed defendant BELL a Mesa employee
24 identification card template containing a photograph of a co-
25 conspirator.

26 Overt Act No. 49: On or about April 3, 2017, defendant BELL
27 used the internet to purchase plastic identification card stock.
28

1 Overt Act No. 50: On or about April 29, 2017, defendant LLOYD
2 used a fraudulently obtained non-revenue ticket to fly from IAH to
3 FLL.

4 Overt Act No. 51: On or about May 1, 2017, defendant LLOYD
5 used a fraudulently obtained non-revenue ticket to fly from FLL to
6 IAH.

7 Overt Act No. 52: On or about May 5, 2017, defendant LLOYD
8 used a fraudulently obtained non-revenue ticket to fly from IAH to
9 LAX.

10 Overt Act No. 53: On or about May 6, 2017, defendant LLOYD
11 possessed, and attempted to use, a fraudulent Mesa employee
12 identification card in order to board a Spirit flight using a
13 fraudulently obtained non-revenue ticket from LAX to IAH.

14 Overt Act No. 54: On or about May 17, 2017, defendant BELL
15 possessed an index card containing the names, dates of hire, and
16 employee numbers of Mesa employees.

COUNT TWO

[18 U.S.C. § 1028(f)]

27. The Grand Jury repeats, re-alleges, and incorporates by reference paragraphs 1 through 23, 25, and 26 of this First Superseding Indictment as though fully set forth herein.

A. OBJECT OF THE CONSPIRACY

28. Beginning on a date unknown but at least as early as February 2016, and continuing until a date unknown but at least as late as in or about November 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants BELL, FELIX-UKWU, NICHOLS, JEMISON, FERGUSON, and LLOYD, together with others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally transfer, possess, and use, without lawful authority, a means of identification of another person with the intent to commit, to aid and abet the commission of, and in connection with the commission of, a violation of Federal law, namely, Conspiracy to Commit Wire Fraud, a felony violation of Title 18, United States Code, Section 1349, in violation of Title 18, United States Code, Sections 1028(a)(7), (b)(1)(D).

B. THE MANNER AND MEANS OF THE CONSPIRACY

29. The means by which the object of the conspiracy was to be accomplished are set forth in paragraph 25 of the First Superseding Indictment and are incorporated by reference as if fully set forth herein.

C. OVERT ACTS

30. In furtherance of the conspiracy and to accomplish its object, defendants BELL, FELIX-UKWU, NICHOLS, JEMISON, FERGUSON, and LLOYD, together with others known and unknown to the Grand Jury,

1 committed and willfully caused others to commit, within the Central
2 District of California and elsewhere, Overt Acts 1 through 54 of
3 Count One of this First Superseding Indictment, which are hereby
4 repeated, re-alleged, and incorporated by reference as if fully set
5 forth herein.

COUNT THREE

[18 U.S.C. § 1028(a)(7)]

31. The Grand Jury repeats, re-alleges, and incorporates by reference paragraphs 1 through 23, 25, and 26 of this First Superseding Indictment as though fully set forth herein.

32. On or about May 28, 2016, in Los Angeles County, within the Central District of California, and elsewhere defendant NICHOLS knowingly transferred, possessed and used, without lawful authority, the means of identification of another person, namely, the employee number and date of hire of Mesa Airlines employee B.E., with the intent to commit, to aid and abet the commission of, and in connection with the commission of, a violation of Federal law, namely, Conspiracy to Commit Wire Fraud, a felony violation of Title 18, United States Code, Section 1349, with said transfer, possession and use affecting interstate and foreign commerce.

COUNT FOUR

[18 U.S.C. § 1028(a)(7)]

33. The Grand Jury repeats, re-alleges, and incorporates by reference paragraphs 1 through 23, 25, and 26 of this First Superseding Indictment as though fully set forth herein.

34. On or about June 14, 2016, in Los Angeles County, within the Central District of California, and elsewhere defendant FELIX-UKWU knowingly transferred, possessed and used, without lawful authority, the means of identification of another person, namely, the employee number and date of hire of Mesa Airlines employee L.M., with the intent to commit, to aid and abet the commission of, and in connection with the commission of, a violation of Federal law, namely, Conspiracy to Commit Wire Fraud, a felony violation of Title 18, United States Code, Section 1349, with said transfer, possession and use affecting interstate and foreign commerce.

COUNT FIVE

[18 U.S.C. § 1028(a)(7)]

35. The Grand Jury repeats, re-alleges, and incorporates by reference paragraphs 1 through 23, 25, and 26 of this First Superseding Indictment as though fully set forth herein.

36. On or about February 10, 2017, in Los Angeles County, within the Central District of California, and elsewhere defendant JEMISON knowingly transferred, possessed and used, without lawful authority, the means of identification of another person, namely, the employee number and date of hire of Mesa Airlines employee B.E., with the intent to commit, to aid and abet the commission of, and in connection with the commission of, a violation of Federal law, namely, Conspiracy to Commit Wire Fraud, a felony violation of Title 18, United States Code, Section 1349, with said transfer, possession and use affecting interstate and foreign commerce.

COUNT SIX

[18 U.S.C. § 1028(a)(7)]

37. The Grand Jury repeats, re-alleges, and incorporates by reference paragraphs 1 through 23, 25 and 26 of this First Superseding Indictment as though fully set forth herein.

38. On or about May 6, 2017, in Los Angeles County, within the Central District of California, and elsewhere defendant LLOYD knowingly transferred, possessed and used, without lawful authority, the means of identification of another person, namely, the employee number and date of hire of Mesa Airlines employee L.C., with the intent to commit, to aid and abet the commission of, and in connection with the commission of, a violation of Federal law, namely, Conspiracy to Commit Wire Fraud, a felony violation of Title 18, United States Code, Section 1349, with said transfer, possession and use affecting interstate and foreign commerce.

COUNT SEVEN

[18 U.S.C. § 1028A(a)(1)]

39. On or about May 28, 2016, in Los Angeles County, within the Central District of California, defendant ARNOLD NICHOLS, also known as "A" ("NICHOLS"), together with others known and unknown to the Grand Jury, knowingly transferred, possessed, and used, without lawful authority, means of identification that defendant NICHOLS knew belonged to another person, that is, the employee number and date of hire of Mesa Airlines employee B.E., during and in relation to the offense of Conspiracy to Commit Wire Fraud, in violation of Title 18, United States Code, Section 1349, as charged in Count One of this First Superseding Indictment.

COUNT EIGHT

[18 U.S.C. § 1028A(a)(1)]

40. On or about June 14, 2016, in Los Angeles County, within the Central District of California, defendant FEMI FELIX-UKWU ("FELIX-UKWU"), together with others known and unknown to the Grand Jury, knowingly transferred, possessed, and used, without lawful authority, means of identification that defendant FELIX-UKWU knew belonged to another person, that is, the employee number and date of hire of Mesa Airlines employee L.M., during and in relation to the offense of Conspiracy to Commit Wire Fraud, in violation of Title 18, United States Code, Section 1349, as charged in Count One of this First Superseding Indictment.

COUNT NINE

[18 U.S.C. § 1028A(a)(1)]

41. On or about February 10, 2017, in Los Angeles County, within the Central District of California, defendant KAMILLE JEMISON, also known as "Camille Jemison" ("JEMISON"), together with others known and unknown to the Grand Jury, knowingly transferred, possessed, and used, without lawful authority, means of identification that defendant JEMISON knew belonged to another person, that is, the employee number and date of hire of Mesa Airlines employee B.E., during and in relation to the offense of Conspiracy to Commit Wire Fraud, in violation of Title 18, United States Code, Section 1349, as charged in Count One of this First Superseding Indictment.

COUNT TEN

[18 U.S.C. § 1028A(a)(1)]

42. On or about May 6, 2017, in Los Angeles County, within the Central District of California, defendant ALPHONSO LLOYD ("LLOYD"), together with others known and unknown to the Grand Jury, knowingly transferred, possessed, and used, without lawful authority, means of identification that defendant LLOYD knew belonged to another person,

//

//

1 that is, the employee number and date of hire of Mesa Airlines
2 employee L.C., during and in relation to the offense of Conspiracy to
3 Commit Wire Fraud, in violation of Title 18, United States Code,
4 Section 1349, as charged in Count One of this First Superseding
5 Indictment.

7 A TRUE BILL

9 151
10 Foreperson

13 NICOLA T. HANNA
14 United States Attorney

15 

16 LAWRENCE S. MIDDLETON
17 Assistant United States Attorney
18 Chief, Criminal Division

19 JUSTIN RHOADES
20 Assistant United States Attorney
21 Chief, Violent & Organized Crime
22 Section

23 RANEE A. KATZENSTEIN
24 Assistant United States Attorney
25 Chief, Major Frauds Section

26 MONICA E. TAIT
27 Assistant United States Attorney
28 Deputy Chief, Major Frauds
Section

JOSEPH D. AXELRAD
Assistant United States Attorney
Violent & Organized Crime Section

POONAM G. KUMAR
Assistant United States Attorney
Major Frauds Section

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA	
United States of America v. MONIQUE FERGUSON Defendant(s)	CASE NUMBER 4:19MJ601 CR18-529(A)-MWF <div style="text-align: right;">5</div> WARRANT FOR ARREST UNDER SEAL

TO: UNITED STATES MARSHAL AND ANY AUTHORIZED UNITED STATES OFFICER

YOU ARE HEREBY COMMANDED to arrest MONIQUE FERGUSON

and bring him/her forthwith to the nearest Magistrate Judge to answer a(n): ☐ Complaint ☒ Indictment
☐ Information ☐ Order of Court ☐ Probation Violation Petition ☐ Violation Notice
 Charging him/her with: (ENTER DESCRIPTION OF OFFENSE BELOW)

18 U.S.C. § 1349: Conspiracy to Commit Wire Fraud;

18 U.S.C. § 1028(f): Conspiracy to Possess, Use, and Transfer a Means of Identification

in violation of the following Title, United States Code, Section(s)

SEE ABOVE

Kory K. Gray
DATE OF ISSUANCE

Clerk of Court
SIGNATURE OFFICER

ANDRES PEDRO

March 15, 2019 LOS ANGELES, CALIFORNIA
DATE AND LOCATION OF ISSUANCE

BY STEVE KIM
NAME OF JUDICIAL OFFICER

RETURN

THIS WARRANT WAS RECEIVED AND EXECUTED WITH THE ARREST OF THE ABOVE-NAMED DEFENDANT AT (LOCATION)

SIGNATURE

SIGNATURE OF JUDICIAL OFFICER

DATE OF ARREST

TIME

DESCRIPTIVE INFORMATION FOR DEFENDANT
(CONTINUE ON PAGE TWO)

SIGNATURE OF JUDICIAL OFFICER

WARRANT FOR ARREST

PAGE 1 OF 2